

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**JULIET JONES,**

Plaintiff,

v.

**METRO ONE LOSS PREVENTION  
SERVICES GROUP, INC.**

Defendant.

Case No. 24-37

**JURY TRIAL DEMANDED**

**MOTION FOR DEFAULT JUDGMENT**

NOW COMES Plaintiff, Juliet Jones, by and through her attorney, David M. Manes, Esq., of Manes & Narahari LLC and brings forth this Motion for Default Judgment, and in support thereof avers as follows:

1. Plaintiff avers the veracity of the facts alleged in his Complaint in the above captioned matter and incorporates all stated facts herein.

2. On January 9, 2024, Plaintiff filed a timely and appropriate cause of action against Defendant before this Honorable Court alleging sex discrimination and retaliation in the workplace in violation of both Title VII of the Civil Rights Act of 1964 and the Pennsylvania Human Relations Act of 1955. *See Plaintiff's Exhibit 1.*

3. B. Junior Davis returned an Affidavit of Service in this matter stating the Complaint and summons in this action were served on Defendant on March 20, 2024 at 3:25 p.m. Service was made on Kelli Springfield, a person authorized by law to accept service on behalf of Defendant. *See Plaintiff's Exhibit 2.*

4. Defendant had 21 days from March 20, 2024 to respond to the Complaint in this action.

5. Plaintiff asserts that as of the date of this filing, more than twenty-one days have passed since the issuance of the Summons.

6. Further, Plaintiff asserts that at this time Defendant has neither pleaded nor responded to the Complaint and has exhausted the twenty-one-day window allotted to provide such response.

7. Plaintiff avers that Defendant is not a minor, incompetent, nor a member of any military service.

8. At this time Plaintiff has requested entry of Default Judgment against Defendant with the Clerk of Courts pursuant to Rule 55(a) of the Federal Rules of Civil Procedure. *See Plaintiff's Exhibit 3.*

9. The Clerk of Courts entered the Default against Defendant. *See Plaintiff's Exhibit 4.*

10. Thus, Plaintiff motions for Default Judgment on this matter.

11. Plaintiff additionally requests a hearing with this Court for the sole purpose of determining damages.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court consider the above Motion for Default Judgment and grant the relief requested therein. Specifically, Plaintiff requests this Honorable Court enter a Default Judgment against the Defendant, award all damages available at law and in equity, including: lost wages, front pay, compensatory damages, punitive damages, court costs, attorney fees, pre-judgment and continuing interest, and any other relief that the Court

deems necessary and proper, and schedule a hearing for the sole purpose of calculation of damages.

Respectfully Submitted,

/s/ David M. Manes

David M. Manes, Esq.

PA ID: 314661

**Manes & Narahari LLC**

One Oxford Centre

301 Grant Street, Suite 270

Pittsburgh, PA 15219

(412) 626-5590 Direct

(412) 650-4845 Fax

dm@manesnarahari.com